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November 3, 2022

The Honorable Alex G. Tse, Magistrate Judge
Judge of the United States District Court
450 Golden Gate Avenue
Courtroom A – 15th Floor
San Francisco, CA 94102

Re: *Anibal Rodriguez, et al., v. Google LLC*, Case No. 3:20-CV-04688

Dear Judge Tse,

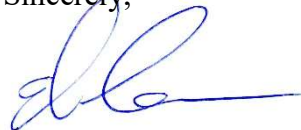
Last week, Google noticed that a declaration submitted by a Google witness in November 2021 included a typo that was carried over into an Order the Court issued relating to Plaintiffs' request that Google preserve data logs. *See* Declaration of Steve Ganem, Dkt. 193-1. In the declaration, paragraph 4 states in part: "For context, just 56 days' worth of data totals over 27 petabytes of data *per day*." The phrase "per day" is a typo. The sentence should have read "56 days' worth of data totals over 27 petabytes of data." The "per day" concept was an accidental reference to the per-day cost of storing that much data, which is discussed later in the declaration.

In the Court's Order issued on December 1, 2021, Dkt. 185, the Court stated in part: "But they don't suggest that they intend to, or have the means to, sift through and count 27 petabytes of data per day." The phrase "per day" appears to carry over the typo in the Ganem declaration. The phrase should be "per 56 days."

None of the other calculations in the Ganem declaration or in the Court's Order contain any inaccuracies, including the amount of money Google estimated would be required to store the data in question: "two years' worth of such data would cost \$3 million, and three years would cost \$6 million."

Google apologizes for this error and would be happy to discuss it further with the Court or Plaintiffs if there are any follow-up questions.

Sincerely,



Eduardo E. Santacana